

EXHIBIT 1

UniFirst's Proposed Pretrial Schedule

<u>Event</u>	<u>Deadline</u>
Common Issue Fact Discovery	
Court enters scheduling order	X
Common issue initial disclosures under Rule 26	X + 1 month
Service of common issue written discovery	X + 2 months
Objections and responses to common issue written discovery	X + 3 months
Completion of common issue document production	X + 6 months
Filing of motions to compel common issue written discovery	X + 7 months
Depositions of fact witnesses regarding common issues	X + 7 months – X + 11 months
Close of common issue fact discovery	X + 11 months ¹
Common Issue Expert Discovery	
Plaintiffs to serve expert reports for experts who will testify on common issues	X + 12 months
Defendants to serve expert reports for experts who will testify on common issues	X + 14 months
Plaintiffs to file any motions for leave to file rebuttal expert reports (attaching proposed reports)	X + 15 months
Defendants to serve any surrebuttal expert reports	X + 16 months
Depositions of expert witnesses regarding common issues	X + 16 months – X + 18 months
Common issue expert discovery complete	X + 18 months
Common Issue Dispositive Motions²	
Common issue Rule 56 motions	Motions filed X + 19 months Oppositions by X + 20 months Replies by X + 20.5 months

¹ This deadline assumes that any motions to compel are resolved and any supplemental productions ordered by the Court are made within a timeframe consistent with this proposed schedule.

² UniFirst already has filed a motion to dismiss all cases for failure to state a claim. Under the current schedule, the PSC will file its response to UniFirst's Motions to Dismiss by August 25, 2014, and UniFirst will file its reply brief by September 16, 2014.

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<u>Event</u>	<u>Deadline</u>
Selection of 20 Bellwether Cases for Full Case-Specific Discovery	
All Plaintiffs in the MDL to serve completed Plaintiff Profile Forms ("PPF") and records releases	X + 1 month
Defendants to notify Plaintiffs of any claimed material deficiencies in the PPFs and records releases	X + 4 months
Plaintiffs to cure any claimed material deficiencies in the PPFs and records releases	X + 6 months
Defendants to collect and review plaintiffs' medical records and to review PPFs for newly-filed cases ³	X + 6 months – X + 16 months
Parties meet and confer concerning appropriate categories/buckets for case-specific discovery	X + 16 months
PSC and Defendants each select 20 cases to include in case-specific discovery pool and submit briefs in support of their selections	X + 18 months
Court selects 20 of the 40 proposed cases for case-specific discovery	X + 20 months
Case-Specific Schedule	
Amended complaints as to the 20 cases selected for case-specific discovery	X + 21 months
Case-specific motions to dismiss (as to any of the 20 cases)	Motions filed X + 22 months Oppositions by X + 23 months Replies by X + 24 months
Case-specific fact and expert discovery	X + 24 months – X + 30 months, with interim deadlines to be set at a later date
Case-specific Rule 56 motions	Motions filed X + 31 months Oppositions by X + 32 months Replies by X + 33 months
PSC and Defendants propose 10 cases each for bellwether trials and submit briefs in support of their selections	Two weeks after the resolution of case-specific motions for summary judgment
Court selects 6 of the 20 cases to proceed to trial and sets trial order/dates	Approximately X + 36 months

³ For any cases filed after entry of this order, plaintiffs shall serve completed PPFs and medical records releases within 2 weeks of filing; defendants shall notify such plaintiffs of any material deficiencies within 2 weeks of receipt of these forms; and such deficiencies shall be cured within 2 weeks of notification.